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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AUDIO VISUAL SERVICES GROUP, INC.  
d/b/a PSAV PRESENTATION SERVICES, a  
Delaware Corporation,

Plaintiff,

v.

VICTOR CHANG, an individual,

Defendant.

CASE NO.: 2:15-cv-01449-APG-VCF

**STIPULATION AND PROPOSED  
ORDER TO EXTEND TEMPORARY  
RESTRAINING ORDER AND  
CONTINUE HEARINGS**

**(First Request)**

Defendant Victor Chang (“Mr. Chang” or “Defendant”) and Plaintiff Audio Visual Services Group, Inc. d/b/a PSAV Presentation Services (“PSAV” or “Plaintiff”), by and through their respective attorneys of record, pursuant to Federal Rule of Civil Procedure 6(b)(1), and Local Rule 6-1, hereby stipulate and agree as follows:

1. Plaintiff commenced this action on July 29, 2015 by filing its *Complaint for Injunctive Relief and Damages* (Dkt #1).

2. Also on July 29, 2015, Plaintiff filed an *Emergency Ex Parte Motion for Temporary Restraining Order, Preliminary Injunction and Supporting Memorandum of Points and Authorities* (Dkt. #5) wherein Plaintiff sought to enjoin Mr. Chang from describing, disclosing, misappropriating, publishing, taking, transmitting, transferring, or using for any

1 purposes certain information Plaintiff contends is confidential and/or proprietary (the  
2 “Confidential and Trade Secret Information”).

3 3. On July 30, 2015, the Court entered a *Temporary Restraining Order* (Dkt. #7)  
4 (the “TRO”), which required Mr. Chang to, among other things, recall and deliver to Plaintiff all  
5 original and copies of any and all correspondence, documents and other material containing,  
6 referring or relating to the Confidential and Trade Secret Information, which are in his  
7 possession, custody or control, and to refrain from altering, deleting, modifying or removing any  
8 data from any and all personal data devices.

9 4. The TRO also required Mr. Chang to file and serve upon Plaintiff’s counsel  
10 within ten (10) days after entry of the TRO a written notice, under oath, setting forth in detail the  
11 manner in which he has complied with the TRO (the “Written Notice”).

12 5. Further, the TRO set a hearing on Monday, August 10, 2015, at 3:30 p.m. at  
13 which time the Court would hear oral argument and decide whether to extend the TRO or grant  
14 preliminary injunctive relief (the “Preliminary Hearing”).

15 6. The Summons, Complaint and TRO were served upon Mr. Chang on or about  
16 July 30, 2015. Accordingly, the date by which the Written Notice is required to be filed and  
17 served is Monday, August 10, 2015.

18 7. On August 6, 2015, the Court entered an *Order* (Dkt #10) setting a status hearing  
19 to determine additional briefing on the issue of Plaintiff’s request for permission to enter Mr.  
20 Chang’s premises and work location to identify and inspect locations where the information at  
21 issue may be stored, which was set for August 14, 2015 at 2:00 p.m. (the “Status Hearing”).

22 8. The parties are currently coordinating the preservation and return of the  
23 Confidential and Trade Secret Information without additional Court intervention.

24 9. WHEREFORE, the parties stipulate and agree to extend the deadline for Mr.  
25 Chang to file and serve the Written Notice and to continue the Preliminary and Status Hearings  
26 as follows:

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- a) The parties agree to extend the *Temporary Restraining Order* (Dkt. #7), filed on July 30, 2015, until the continued date of the Preliminary Hearing as set forth below.
- b) The parties agree to extend the deadline for Mr. Chang to file and serve the Written Notice for a period of ten (10) days to August 20, 2015.
- c) The parties agree to continue the Preliminary Hearing for a period of ten (10) days to August 20, 2015, or as soon thereafter as the Court's schedule will allow.
- d) The parties agree to continue the Status Hearing for a period of ten (10) days to August 24, 2015, or as soon thereafter as the Court's schedule will allow.

10. This Stipulation is submitted prior to the expiration of the period originally provided for (1) the filing and service of the Written Notice (August 10, 2015), (2) the Preliminary Hearing (August 10, 2015) and (3) the Status Hearing (August 14, 2015), is not interposed merely for delay, and is made in good faith between the parties hereto. The parties have not made a similar prior request.

**IT IS SO STIPULATED:**

DATED August 7, 2015.

DATED August 7, 2015.

/s/ David J. Freeman, Esq.

/s/ Dennis D. Leone, Esq.

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ORDER: the Court will issue a separate minute order setting new hearing dates and times.

**IT IS SO ORDERED** this 7th day of August, 2015:

  
UNITED STATES DISTRICT JUDGE